

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
WWW.WBKLaw.COM
PHILLIP R. MARCHESIELLO
202.383.3343
PMARCHESIELLO@WBKLAW.COM

Via Electronic Comment Filing System (ECFS)

July 15, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Numbering Policies for Modern Communications*, WC Docket No. 13-97, *IP-Enabled Services*, WC Docket No. 04-36, *Telephone Number Requirements for IP-Enabled Services Providers*, WC Docket No. 07-243, *Telephone Number Portability*, CC Docket No. 95-116, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Connect America Fund*, WC Docket No. 10-90, *Numbering Resource Optimization*, CC Docket No. 99-200

Dear Marlene H. Dortch:

This letter is being filed with the Federal Communications Commission (“Commission”) on behalf of Millicorp as notice of an *ex parte* presentation in the above-referenced proceeding.

On Thursday, July 12, 2013, Tim Meade, President of Millicorp; Donovan Osborne, Millicorp’s Director of Communications; Duane Dyar, Millicorp’s Vice President of Operations; and the undersigned (collectively, “Millicorp”) met with Michelle Berlove, William Dever, Marilyn Jones, Rhonda Lien, Ann Stevens, and John Visclosky of the Wireline Competition Bureau to discuss Millicorp’s participation in the Commission’s Voice Over Internet Protocol (“VoIP”) numbering trial (“Trial”) in the above-referenced proceedings. During the meeting, Millicorp distributed the attached document depicting the five phases of Millicorp’s participation in the Trial.

Millicorp explained to the Commission staff that it is in the process of completing Phase 1 set forth in the attached document. Millicorp provided details regarding the actions that it has taken to date in an effort to qualify to obtain direct access to numbering resources, including commencing negotiation of an interconnection agreement with Verizon and retaining Inteliquent to provide local access tandem services to enable Millicorp to satisfy its facilities readiness obligations. Millicorp stated that it has secured an operating company number (OCN); registered with the North American Numbering Plan Administration (NANPA) and the National Number Pool Administration; and submitted a Numbering Resource Utilization Forecast (NRUF). In

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addition, Millicorp filed an application with the Number Portability Administration Center (NPAC), which application was approved subsequent to the meeting. Millicorp also discussed the next steps that it will be required to undertake prior to being assigned new numbers and prior to porting numbers that it currently purchases from a competitive local exchange carrier (CLEC), including applying for a Central Office (CO) code and a Location Routing Number (LRN); inserting rates and routes into the Business Integrated Routing and Rating System (BIRRDs) to make them available to carriers in the Local Exchange Routing Guide (LERG); and participating in the NPAC porting process. Further, Millicorp explained that under certain circumstances (primarily depending on the identity of the carrier involved) the porting process can be time and resource intensive. Finally, Millicorp explained that it may take several billing cycles of up to 90 days each (including any dispute and audit periods) to ensure that intercarrier compensation procedures operate smoothly and without disruption.

In light of these factors, Millicorp suggested that the Commission refrain from requiring Trial participants to relinquish numbering resources at the end of the six-month Trial. Instead, Millicorp suggested that Trial participants be permitted to retain the numbering resources that they obtained during the Trial and that they be required to continue to file periodic reports regarding these numbering resources in the appropriate dockets.¹ According to Millicorp, this will enable the Commission to optimize the feedback that it receives from Trial participants and thereby secure as much valuable technical data as possible during and after the Trial and prior to the issuance by the Commission of final rules regarding direct access to numbering resources by VoIP providers.

Please direct any questions regarding the foregoing to the undersigned.

Respectfully,

/s/ Phil Marchesiello

Phil Marchesiello

Counsel to Millicorp

Attachment

cc (all via electronic mail): Michelle Berlove, William Dever, Marilyn Jones, Rhonda Lien, Ann Stevens, and John Visclosky

¹ See *Numbering Policies for Modern Communications*, Notice of Proposed Rulemaking, Order, and Notice of Inquiry, 28 FCC Rcd 5842, ¶102 n. 254 (2013) (“We note that the expiration of the waiver alone does not require Vonage to return the numbers it has received under the waiver.”).

Millicorp

FCC Number Waivering Trial

